

## II. Remarks

Reconsideration and re-examination of this application in view of the above amendments and the following remarks is herein respectfully requested.

After entering this Reply, claims 1-9, 15, and 16 remain pending.

### *Rejections Under 35 U.S.C. § 103*

Claims 1-2 and 4-7 and 15-16 were rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent Publication No. 2002/0130354 to Sekigawa et al. (Sekigawa) in view of U.S. Patent No. 5,821,575 issued to Mistry et al. (Mistry).

Claim 1 defines two electrically insulating insulating layers and two electrically insulating regions. Each of these are independent elements of the claims and must be taught by the prior art references.

For the embodiment shown in Figure 2, the electrically insulating layers are shown as 100 and 102, while the electrically insulating regions are denoted by 12 and 110. Each of these elements are distinct. However, the examiner refers to 71 and 72 as both the electrically insulating layers and the electrically insulating regions.

Claim1 also recites the connecting region covering the substrate region between the insulating layers and between the control regions. The examiner relies on Mistry (Col. 3, Ln 20-33,65-67 and Col. 4, Ln. 1-2) in rejecting this element. However, the cited text does not teach this element and the examiner has not specifically addressed how the text teaches these elements in the rejection. It can only be assumed that that the examiner is referring to the Schottky contact region which is only disclosed as “(d) a Schottky contact region providing a Schottky diode between the semiconductor body and the source region; and (e) a Schottky contact

region providing a Schottky diode between the semiconductor body and the drain region.” However, this text does not suggest the connecting region covering the substrate region between the insulating layers and between the control regions.

The claimed elements provide a very well defined structural relationship between the covering area, the substrate region, the insulating layers, and the control regions. The defined structural relationship is not taught or suggested by any of the references. Therefore, for these reasons as well, the combination does not teach each of the elements of claim 1.

Claims 2, 4-7 and 15-16 depend from claim 1 and are, therefore, patentable for at least the same reasons as given above in support of claim 1.

Claims 3 and 8 were rejected under 35 U.S.C. §103(a) as being unpatentable over Sekigawa and Mistry as applied to claim 1 above, and further in view of U.S. Patent No. 5,683,918 issued to Smith et al. (Smith).

Claims 3 and 8 depend from claim 1. Smith does not teach the elements noted above as missing from claim 1. Therefore, claims 3 and 8 are patentable for at least the same reasons as given above in support of claim 1.

Claim 9 was rejected under 35 U.S.C. §103(a) as being unpatentable over Sekigawa and Mistry as applied to claim 1 above, and further in view of U.S. Patent Publication No. 2003/0178670 to Fried et al. (Fried).

Claim 9 depends from claim 1. Fried does not teach the elements noted above as missing from claim 1. Therefore, claim 9 is patentable for at least the same reasons as given above in support of claim 1.

*New Claim 17*

Claim 17 depends from claim 1 and is, therefore, patentable for at least the same reasons as claim 1. In addition, claim 17 recites that the insulating regions are arranged at a fifth and sixth side of the substrate region, the fifth and sixth side being arranged at mutually opposite sides of the substrate region. This element is clearly not taught by the cited references and, therefore, claim 17 is also patentable for these reasons as well.

*Conclusion*

In view of the above amendments and remarks, it is respectfully submitted that the present form of the claims are patentably distinguishable over the art of record and that this application is now in condition for allowance. Such action is requested.

Respectfully submitted by,

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/Robert K. Fergan/  
Robert K. Fergan  
Reg. No.: 51,674  
Attorney for Applicant

BRINKS HOFER GILSON & LIONE  
P.O. Box 10395  
Chicago, IL 60610  
(734) 302-6000